

**McCULLOCH | KLEINMAN**  
INTELLECTUAL PROPERTY ATTORNEYS

March 19, 2024

**VIA ECF**

Hon. Andrew L. Carter, Jr., U.S.D.J.  
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New York, NY 1007  
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**Re: *Kee v. The Detroit Lions, Inc., et al.*, 1:24-cv-00223 (ALC)**

Judge Carter,

This firm represents Plaintiff Allen Kee (“Plaintiff”) in the above-referenced matter. I write jointly with counsel for Defendants NFL Properties LLC and NFL Enterprises, LLC, The Detroit Lions, Inc., Getty Images (US) Inc., Fanatics Retail Group North, LLC, Bullion International, Inc. d/b/a The Highland Mint, Dick’s Sporting Goods, Inc., and McFarlane Toys, Inc. (collectively, “Defendants”) pursuant to Rule 1(D) of Your Honor’s Individual Rules to request an adjournment/extension or reset of certain filing deadlines.

The current deadline for Defendants to file their answers to the Complaint is March 22, 2024. Given that Plaintiff intends to file an amended complaint, however, the parties have agreed that extending this deadline until after Plaintiff’s amended complaint is filed is appropriate and would avoid needless filings and unnecessary costs.

The parties thus jointly request that the deadline to file Plaintiff’s amended complaint be set to Friday, April 12, 2024, and the Defendants’ answers or responses to the amended complaint be filed by Friday, May 10, 2024.

This is the second request to extend the deadline for Defendants to file answers, with all counsel’s consent.

Respectfully submitted,



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